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Comment for the FCC Notice of Public Rulemaking (NPRM) on "Video Franchises" (05-311)

As a supporter of local media in principle and as a television consumer, I would like to submit my comments to the FCC's "Notice of Proposed Rulemaking" 05-311 on "video franchising".

I've been a member of two public access television stations, in Massachusetts with Amherst Community Television (ACTV) and in California with Community Television of Santa Cruz County (CTSCC). At ACTV, I spent a semester interning at the station assisting youth in moving their ideas to the screen and watching the power of local media empower both the students participating in the program as well as the viewing audience, some members of which responded positively to the work in local publications and town meetings.

Since moving to Philadelphia, I've been unable to join another public access station as none exists; Comcast has not filled its franchise agreement to facilitate the operation of PEG TV channels in the city and the city of Philadelphia has not held Comcast to the agreement. Were the necessity of local agreements removed, there would be no grounds whatsoever to demand the implementation of PEG channels, and the vast diversity of voices in this city, already hushed through neglect and avoidance, would remain silenced hereafter.

I know the idea of removing the franchise agreement condition is to make it less expensive for telephone carriers, particularly Verizon, to set up fiber-optic lines for television service, allowing for 'greater competition' among media carriers, and thus more choices for consumers. But no matter the decision on whether franchising agreements are made on the local or state level, this idea will never come to fruition for all of the population – only for those who are considered economically inclined to buy Verizon's services, who are not coincidentally the people who least need to save the money and whose voices already carry into the public domain through their social and capital power.

I'm not just being cynical that Verizon will redline poor neighborhoods with its television service – I'm speaking from the experience of already being redlined by Verizon for internet service. Verizon's been tearing through wealthier neighborhoods to compete with Comcast to provide high-speed internet, but in my community I had no choice. My boyfriend and I, brand new homeowners in South Philadelphia, had to wait through three grueling months of dealing with Comcast's notoriously bad customer service to have our cable hooked up for internet (even though the line should only have had to be turned on – Comcast wires were run through the house as it was built due to kick-backs they provided the developer). When we finally were able to use the internet in our home, we found we would be paying twice the amount that the fortunate living in Verizon's sun.

Philadelphia is a city with a large disadvantaged population, in some ways splintered by diversity and in some ways united by it. The hope for us is that we can come together – but we need to be able to communicate with one another on a large scale to do so. By removing local franchising rules, you obliterate the primary way for local communities to communicate, grow and work together for the better public good.

Thank you for your consideration of my comments,
Rachel Linstead